



Department for
Business, Energy
& Industrial Strategy



Ministry of Housing,
Communities &
Local Government

ENERGY PERFORMANCE CERTIFICATES FOR BUILDINGS

Action Plan

September 2020

EPC Action Plan

Executive Summary

This Action Plan sets out a series of actions following the Call for Evidence on Energy Performance Certificates (EPCs) that was launched in July 2018. These actions will deliver:

An EPC system that produces accurate, reliable and trusted EPCs

Policies to achieve our aspiration for as many homes as possible to be EPC Band C by 2035 are likely to increasingly depend on an EPC rating. The rating of EPCs will begin to have a financial value and incentives to improve the rating are likely to increase as a result. EPCs therefore need to be accurate, reliable and trusted. To do this we will explore ways to: better identify non-compliance and review the penalties imposed for this; provide better consumer information; and improve quality assurance of EPCs including better oversight and accountability and formal error reporting.

An EPC that engages consumers and supports policies to drive action

We need to engage consumers and third parties more on how a building is performing and how they can make improvements that will be appropriate to them and to the property. EPCs need to work for consumers, rather than be seen as purely a regulatory necessity. More policies are likely to rely on EPCs in the future, as we move towards meeting our aspiration for as many homes as possible to be EPC band C by 2035. Actions to support this include improving Minimum Energy Efficiency Standards (MEES) compliance in the Private Rented Sector (PRS); reviewing EPC recommendations; improving the presentation of cost data on EPCs and clarifying EPC guidance.

A data infrastructure fit for the future of EPCs

As part of achieving the UK's ambitious target for net-zero greenhouse gas emissions by 2050, EPCs provide consumers, building owners and occupiers and third parties with information on the performance of the building stock, and support effective decisions on improving the energy efficiency of buildings. It is, therefore, important that it is easy to access EPC information and link it to other relevant sources of data. The data infrastructure for EPCs also needs to continue to evolve to meet future needs. Actions to achieve this will include the transition to the new Energy Performance of Buildings Register (referred to hereafter as 'The Register') and considering how The Register could work for updating EPCs; an extended Open Data set; considering how additional information can help consumers inform themselves.

Introduction

Background

EPCs are a widely used measure of the energy performance of buildings in the residential, commercial and public sectors and are a key tool in promoting energy performance improvements in buildings. Since their introduction in 2007 EPCs have been required when a property is constructed or offered for sale or let. The purpose of an EPC is to show prospective tenants or buyers the energy efficiency of the property.

EPCs provide policymakers and markets with information about the energy efficiency of the building stock, as well as supporting and encouraging individuals to make informed choices about how to improve the energy efficiency of their building. Increasingly government policy, such as the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 (also known as the Minimum Energy Efficiency Standards or Private Rented Sector Regulations), the Renewable Heat Initiative (RHI) that provides support to install renewable energy production, the Green Deal, providing support for installation of energy efficiency measures, and the Green Homes Grant, providing grants towards the cost of installing energy efficient and low-carbon heating improvements to homes, has relied upon buildings having a current EPC and been linked to achieving a specific EPC rating.

A qualified assessor uses government approved software to process information that has been collected about a building and its installed heating, lighting and ventilation and air conditioning systems to produce an overall rating of A to G (for domestic buildings) or A+ to G (for non-domestic).

EPCs and their underlying data are lodged on Energy Performance of Buildings Register (<https://find-energy-certificate.digital.communities.gov.uk>) along with Display Energy Certificates (DECs) and Air Conditioning Inspection Reports (ACIRs). Anyone can access the register and search for an EPC, DEC or ACIR that has been lodged against an address. There are currently over 21 million EPCs on the registers.

In July 2018 we launched a Call for Evidence on Energy Performance Certificates (EPCs) with the aims of:

1. gaining evidence on how well the current EPC system is working;
2. gathering information on the suitability of the current system of EPCs for both their current and emerging role in measuring building energy performance; and
3. obtaining feedback and suggestions for improvement.

The Call for Evidence outlined the Government's view of what EPCs are used for now, what they are likely to be used for in the future and what important characteristics are required for these uses. We received a total of 229 responses from a wide range of stakeholder whose evidence is set out in our Call for Evidence Summary of Responses document, and has contributed to the proposals in this document to improve the efficiency and effectiveness of EPCs. Responses to multiple choice questions are expressed as percentages; and responses to broader questions are expressed as the number of respondents who made a point, alongside the total number of people who answered each question.

The Future Role of EPCs

Domestic and non-domestic buildings together are estimated to account for around 30% of the UK's total greenhouse gas emissions with homes responsible for 22%. The UK has set in law a target to bring its greenhouse gas emissions to net zero by 2050 – one of the most ambitious targets in the world. To maximise the effectiveness of EPCs in improving the performance of the existing building stock, it is important to ensure that they:

- Provide a trusted, accurate and reliable measure of a building's energy performance
- Engage consumers and supports action to reduce energy use in buildings
- Enable consumers and third parties to access the data they need to make decisions

Some improvements to EPCs will take several years to implement and involve changing complex processes. Some changes will be simpler and faster to make. The Call for Evidence is only the first step in understanding what improvements are required and how they can best be made. This Action Plan builds on the views expressed as part of the Call for Evidence - for each priority area we have set out actions which we will take forward to ensure EPCs are fit for the future. This will involve stakeholder engagement and formal consultations where legislative change is required to take actions forward. Throughout the process we will continue to review the value of actions based on this feedback and any will continually review any potential impacts of the action plan.

A consultation on the Energy Performance of Buildings (England and Wales) Regulations 2012¹ ("The EPB Regulations") will seek views which will be used to inform our future domestic policy after the end of the Transition Period, and consider what flexibilities and improvements may be available now that the UK is no longer bound by EU Directives.

An EPC system that delivers accurate, reliable and trusted EPCs

In this section of the Action Plan we will address questions of reliability, accuracy and compliance as set out in the Call for Evidence.

Preparing for a future where an EPC rating has increased financial value

Several government targets and aspirations for improving energy efficiency standards set out in the Clean Growth Strategy² are based on the EPC rating of a property. In the future, policies are therefore likely to increasingly depend on an EPC rating. This is already the case with Minimum Energy Efficiency Standard Regulations³ in the private rental sector (referred to as Private Rented Sector (PRS) regulations below). The rating of EPCs will therefore increasingly have a financial value and incentives to improve the rating are likely to increase as a result. As such, EPCs will need to be accurate, reliable and trusted.

¹ <https://www.legislation.gov.uk/ukxi/2012/3118/contents/made>

² <https://www.gov.uk/government/publications/clean-growth-strategy>

³ <https://www.legislation.gov.uk/ukxi/2015/962/contents/made>

1.1. Consumers and third parties need to have confidence in the information on EPCs and the process needs to be transparent.

As set out above, of 145 responses to the question 'What evidence do you have relating to the reliability⁴ of EPC assessments? only 5 (3%) answered that reliability was good. In addition to work on improving reliability set out below, consumer trust needs to be addressed, as low trust in EPCs could mean consumers are less likely to consult their EPC when making decisions and to act on recommendations. Better information on how EPCs are created and the limitations of EPCs could help to improve trust. Enabling consumers to check whether the inputs into their EPC are correct would also make EPCs less of a 'black box'.

1.2. Processes for identifying and dealing with poor practice and abuses of the system need to be improved

This applies both to non-compliance with legal requirements and inaccurate EPC ratings. 85% of respondents thought that the proposal to strengthen the quality assurance processes for EPCs would be at least somewhat effective to improve EPC reliability. 87 respondents (60%) mentioned assessor inputs as a reason for variations in EPC quality. Better data outlining assessor performance can help to identify poor assessor performance and non-compliance with regulatory requirements. It can also help to identify training needs, for example through feedback from smart auditing, assessor helpdesk activity and complaints processes. Separately, in 75 responses to the question on compliance levels, evidence provided included desk research and published research and a mix of anecdotal/on the ground references from installers, EPC accreditation schemes and local authorities. Responses suggested compliance with the EPB Regulations to provide an EPC when a property is advertised for sale or let is inconsistent. Ministry of Housing, Communities and Local Government research in response to an FOI request in 2013 suggested that compliance rates for domestic sales, social housing rentals and private domestic rentals were 95%, 75% and 26% respectively (though more recent research does not differentiate between social housing rentals and private domestic rentals⁵). However, enforcement is raised as an issue and it will be important to understand the extent to which better enforcement can encourage compliance with the requirement to secure an EPC. 80% of respondents supported the view that enforcement of the requirement to have an EPC was "minimal or non-existent", and enforcement was raised by the Committee on Climate Change in their 2018 and 2019 reports.

1.3. Sanctions for missing, incorrect or fraudulent EPCs need to be at least commensurate with the cost of meeting EPC rating requirements

Currently compliance with PRS regulations could cost up to £3,500 and the fine for non-compliance could be up to £5,000, but the fine for not having a valid EPC on sale or let of a property is £200. Assessors can be removed from the register, but there are currently no further powers to deal with deliberately falsified EPC ratings, which was raised as a concern by 19 respondents (13%) and has also been raised by Ofgem and Trading Standards. Tougher sanctions would disincentivise building owners from not having an EPC, alongside the PRS framework which would incentivise owners to seek

⁴ In the Call for Evidence, reliability formed part of the section on EPC data quality and how this could be improved. These aspects were: the rating should be reliable across different assessors, EPCs should be an accurate indicator of energy performance, and they should be up to date.

⁵ <https://www.gov.uk/government/publications/energy-performance-of-buildings-regulations-2012-implementation-report>

a good rating. In looking at a tougher sanctions' regime, we will need to consider the most effective way of improving compliance.

1.4. If something goes wrong, consumers need to have an accessible route to redress and confidence that complaints and issues will be dealt with fairly and promptly

Accreditation schemes currently have a structured consumer complaints processes, and complaints can also be referred to MHCLG if not resolved. However, there is currently no process for third parties (i.e. someone who does not commission EPCs but might rely on its rating such as Ofgem or a tenant who was expecting a property to be more energy efficient) to raise a complaint about an incorrect or misleading EPC. Several respondents to the Call for Evidence also raised concerns about the difficulty of resolving EPCs lodged against the wrong address. 21 respondents (15%) suggested better accountability or new redress processes, possibly involving the designation of a new, single, independent body, would improve EPC reliability.

Reflecting real-world performance

In order to ensure greenhouse gas reduction and energy efficiency goals are met, consumers, government and third parties will need to have greater confidence that changes to a building which improve EPC ratings will have a measurable effect on energy use. In the short term, this will be through actions set out above to improve EPC reliability, but in the longer term broader changes are needed.

1.5. EPCs will need to move from a reflection of the features of a building (fabric, services and installed improvement measures) to a true measure of 'in use' building performance

This can be based on more sophisticated building modelling that takes actual energy consumption into account (while remaining a measure of building performance and not occupant behaviour). The Committee on Climate change specifically recommended in their 2018 and 2019 progress reports that EPCs need to reflect real-world performance.

1.6. The National Calculation Methods⁶ used to produce EPCs will consequently also need to evolve

Changes will be needed to incorporate additional data which relates to the real-world performance of the building. Building modelling techniques which allow this have not yet been sufficiently developed and tested for use in EPCs, but preparations need to be made to ensure these techniques can be used in the future. There could also be a role for actual energy usage data for a building, say from SMART meters, to be taken into account if it could be adjusted for user behaviours.

1.7. An alternative will be needed for large, complex non-domestic buildings, where it can be difficult to model energy use accurately

International performance-based schemes have shown that performance-based ratings can be extremely successful at driving carbon reductions in non-domestic buildings. In the Call for Evidence, 92% of respondents supported introducing operational ratings for non-domestic buildings, and this was also recommended by the Green Finance Taskforce and the Committee on Climate Change. The government therefore

⁶ <https://www.gov.uk/government/publications/method-for-calculating-the-energy-performance-of-buildings-notice-of-approval>

committed last year to consult on introducing mandatory operational performance ratings in commercial and industrial buildings. We will consider how such performance ratings will align with the existing Display Energy Certificates (DECs) framework. DECs are currently required only for buildings that are over 250m² that are occupied by a public authority and are frequently visited by the public and show the actual energy use of public buildings.

An EPC system that delivers reliable, trusted EPCs

	Target for commencement	Action
R1	By the end of 2021	We will improve data processes as part of The Register development to enable EPC enforcement authorities to better identify non-compliance and enable better identification of input errors in EPCs.
R2	By the end of 2020	As part of The Register development, we will consider how consumer information around EPCs can be improved and the necessary limitations of the process better explained, for example by providing a walkthrough of the EPC process and an FAQ section.
R3	By the end of 2021	We will investigate how improved quality assurance can improve EPC reliability . In particular, we will look at evidence of the effectiveness of smart auditing processes which were introduced in 2017 and consider ways in which these can be improved further.
R4	By the end of 2020	We will conduct a review of requirements for EPC assessor competence , and work with assessor schemes to tackle poor performance of both assessor schemes, and assessors themselves, including strengthening assessor training, continuous professional development and testing requirements and reviewing the sanctions for poor EPC practice.
R5	By the end of 2021	We will consult on options for the introduction of a new operational ratings scheme for non-domestic buildings . As part of this we will consider how a new operational ratings scheme will align and interact with the existing Display Energy Certificates (DECs) framework.
R6	By the end of 2021	As part of The Register development, we will improve the existing assessor registration process to ensure unique assessor registration numbers to prevent multiple assessor records. This can help to identify errors where assessors who are suspended, or have been removed from the register, by an assessor scheme are registered with more than one scheme. This will prevent EPC assessors who are banned from practising by one accreditation scheme to continue working by switching to another scheme.
R7	By the end of 2020	We will investigate whether it is possible to make available in an annex to EPCs the additional information used for calculating EPCs, such as installed measures, so that property owners can sense-check EPCs more easily.
R8	By the end of 2021	We will introduce SAP 10.2 , an updated version of SAP, which takes into account updated fuel prices, CO ₂ emissions and primary energy factors and includes monthly variation in these factors. This will refine the assumed heating pattern and summer internal temperature calculations. Other changes include changes to modelling of communal heating, revising solar panel self-use assumptions and allowing for battery storage with solar panels. An RdSAP update is likely to follow also towards the end of 2021.

R9	By the end of 2021	We will review the changes needed for SAP 11 , expected to be rolled out in approximately 2025, to make EPCs a more accurate which could include considering the potential role of SMETERs data in SAP.
R10	By the end of 2020	We will consider the case for putting in place a formal error reporting system for The Register, for EPC assessors, consumers, Ofgem and assessor schemes to flag up incorrect or fraudulent EPCs and have them investigated. Issues raised could also be fed back into the smart auditing process.
R11	In 2021	We will review the penalties for EPC non-compliance so that they incentivise EPC compliance and consider options for improved enforcement.
R12	In 2021	We will investigate ways to improve EPC compliance through working with other actors such as mortgage lenders and lettings agents, in addition to EPC enforcement bodies.
R13	By end 2021	We will consider options for improved oversight and accountability of the whole EPC system to deal with quality, compliance, and potential gaming and fraud issues in a more comprehensive way. This will include reviewing the quality assurance regime and considering new measures to improve EPC fraud detection and prevention. One option could be to fund a National Trading Standards body to oversee EPCs, as is currently done for other trading standards issues.

An EPC that engages consumers and supports policies to drive action

This section relates to questions of encouraging action, influencing property decisions and making EPCs up to date, as set out in the Call for Evidence.

Engaging consumers

In the future we will need to engage consumers and third parties more on how a building is performing and how they can make improvements that will be appropriate to them and to the property. EPCs need to work for consumers, rather than be seen as purely a regulatory necessity.

2.1. EPCs need to provide the information consumers need to make decisions in a way that makes sense to them

In the Call for Evidence, 73% of respondents said that EPCs are not effective at encouraging action. Only 47% of respondents thought that consumers have a good understanding of EPC ratings. In the September 2019 BEIS Public Attitudes Tracker survey⁷ only 2% of respondents said they had made changes as a result of their EPC. Of those who had made changes, 48% said EPCs gave them the information they needed. In the English Housing Survey 2017-18⁸, only 24% said EPCs influenced their decision to buy or rent. Work was carried out in 2012 to improve the presentation of EPCs, but both consumer needs and technology are likely to have changed since then.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/844940/BEIS_Public_Attitudes_Tracker_Wave_31_key_findings.pdf

⁸ <https://www.gov.uk/government/statistics/english-housing-survey-2017-to-2018-energy>

2.2. New trigger points for requiring an EPC could encourage additional energy efficiency works and prompt consumers and third parties to become more aware of EPCs and consult them more often

Consumers and third parties will need to be more aware of EPCs and prompted to consult them more often. In the September 2019 BEIS Public Attitudes Tracker survey 58% of respondents were aware of EPCs, but only 6% knew their EPC rating and only 17% recalled that the EPCs contains recommendations. New trigger points could prompt consumers and third parties to consult EPCs and consider works to improve the energy efficiency of their home.

75% of responses to the question about ensuring that information on EPCs remained up to date cited a reduction in the validity period of 10 years for an EPC as a possible solution. Disadvantages identified included the potential for a property to be vulnerable more frequently to being awarded a lower EPC rating, which could affect building owners who are subject to Minimum Energy Efficiency Standards Regulations.

A shorter validity period could capture minor works that do not trigger the building regulations and where potential consequent impact on energy efficiency and carbon emissions has not yet been tested.

Alternatively, the reduction in validity period could be targeted by requiring a new EPC for substantive renovations to a property where the building regulations are triggered, such as extensions and conversions that require planning permission, could be effective in encouraging energy efficiency works. Whilst specific standards of energy efficiency are required to meet the building regulations in terms of energy efficiency and carbon emissions, an EPC requirement could prompt consumers to consider additional energy efficiency works – either beyond those planned for the part of the building to be renovated, or in other parts of the building this would be particularly effective for buildings under 1000m² for which consequential improvements are not required. This could also help to ensure EPCs remain up to date, as the works may have improved the EPC rating. 90% of respondents thought requiring a new EPC for extensions and other major works would be at least somewhat effective in making sure EPCs were up to date.

2.3. Consumers may also want more detailed and tailored information to supplement a basic EPC.

65% of respondents thought that a 'green building passport' (providing a more detailed retrofit plan) would be at least somewhat effective in improving the ability of consumers to make use of EPC information. The Committee on Climate Change recommended implementing the Green Finance Taskforce proposals on Green Building Passports⁹.

Supporting policies to drive action

In order to meet our aspiration for as many homes as possible to be EPC Band C by 2035, in the future more policies are likely to rely on EPCs.

2.4 EPCs need to continuously improve to meet the needs of evolving policies whilst retaining their existing functions

EPCs are currently used for PRS regulations, but responses to stakeholder engagement exercises and previous consultations on PRS regulations have raised

⁹ <https://www.gov.uk/government/publications/accelerating-green-finance-green-finance-taskforce-report>

concerns with some aspects of EPCs when used for PRS regulations. 17 respondents to the Call for Evidence asked for better consistency between EPC and PRS regulations. Stakeholder engagement and results from PRS enforcement pilots have identified tenants are often not provided with EPCs before they make a rental decision, because of ambiguity in the requirements on landlords and estates/lettings agents related to the 7 and 21 day periods that rental properties may be advertised without an EPC, although an EPC must have been commissioned. Some respondents pointed out that differing uses of the term ‘new tenancy’ in PRS and EPB Regulations have caused a discrepancy in how lease renewals and extensions are treated, meaning some of these tenancies may stop being covered by PRS and may not make the expected energy efficiency improvements. As other policies are developed using EPCs, changes may need to be made to EPCs to reflect these new uses. EPCs will also need to take into account changes in the wider energy efficiency sector and new data and technologies that evolve.

2.5 As more property owners are prompted to take action, we need to ensure that recommendations drive the right changes

EPC recommendations need to balance consumer expectations with the limitations of EPC methodology and the needs of existing and proposed policies to encourage consumer action. 88% of respondents supported more tailored recommendations and 79% supported changing the way recommendations are presented. Recommendations need to be suited to the individual property, particularly older and more complex properties, and costs and benefits need to be set out appropriately, including non-financial benefits. Limitations of the EPC model and further information need to be appropriately signposted. Consumers also need to be aware of the potential effects of recommendations on buildings with heritage features, how suggested changes could affect ventilation, damp and overheating. The 2019 Committee on Climate Change report *Fit for the Future*¹⁰ recommended considering ventilation and overheating when setting building performance standards.

An EPC that engages consumers and supports policies to drive action		
	Target for commencement	Action
C1	Ongoing	We will ensure that EPCs are accurate and may be relied upon for use in other government policies which are designed to drive consumers to act, recognising that EPCs alone are often unlikely to change behaviour. Part of the redevelopment of the register includes moving the service onto gov.uk URLs, meaning that we become the authority on EPC data.
C2	By the end of 2020	We will consider changes to the EPB Regulations which would improve compliance with Minimum Energy Efficiency Standards in the Private Rental Sector.
C3	By the end of 2020	We will publish a consultation on the merits of setting requirements for lenders to help households improve energy performance of homes they lend to.
C4	By the end of 2021	We will clarify EPC guidance around two issues that have been raised in relation to PRS minimum standards: <ul style="list-style-type: none"> - Highlighting the existing powers possessed by Local Authorities to delegate responsibilities to other local

¹⁰ <https://www.theccc.org.uk/publication/uk-housing-fit-for-the-future/>

		<p>authorities, either upper or lower tier, under Section 101 of the Local Government Act 1972, which could help to resolve concerns around EPC and PRS enforcement not being aligned in two-tier authorities.</p> <ul style="list-style-type: none"> - Making clear that where Houses in Multiple Occupation (HMOs) have been created since 2008 (when the requirement for an EPC was introduced), the whole building is legally required to have an EPC. <p>Additionally, we will investigate what proportion of current HMOs were created before this date and are currently not legally required to have an EPC.</p>
C5	By the end of 2020	We will consider changes to the EPB Regulations which would improve compliance with Minimum Energy Efficiency Standards in the Private Rental Sector.
C6	Ongoing	As part of The Register development, we will move to an improved presentation of EPC data online which provides data as a URL instead of the current PDF, whilst still providing for a robust offline process to enable legal copies of EPCs and to ensure accessibility for all consumers. This new presentation will present the most important EPC information upfront and allow interested consumers to drill down into further levels of detailed information where relevant.
C7	By the end of 2020	We will consider what additional training requirements would be needed for assessors in relation to suitability of recommendations in relation to heritage buildings, ventilation, damp and overheating.
C8	By the end of 2021	We will review EPC recommendations , which will include the ordering of recommendations and the potential to make recommendations more tailored to the individual property. Better information on the limitations of EPCs and where to go for future advice will be provided. This will also include better information on the potential effects of energy efficiency measures on ventilation, damp and overheating, as well as the suitability of recommendations for older properties or those in conservation areas.
C9	Ongoing	We will continue to make further improvements to the Simple Energy Advice website , including the facility to model how retrofit works would affect EPC ratings, subject to consumer research.
C10	Ongoing	We will improve the presentation of cost data on EPCs, including presenting energy costs over 1 year instead of 3 years, but will also include more details of the non-financial benefits of energy efficiency measures, such as improved comfort and health.
C11	By the end of 2020	We will include more up-to-date information about government policy which relies on an EPC rating, such as the current minimum energy efficiency standards for the private rental sector and government EPC targets. We will continue to review this information to ensure it remains up to date.
C12	Ongoing	We will look at how the existence of a smart meter and other smart technologies can be reflected on EPCs to provide additional information about the features of a property.
C13	Ongoing	We will carry out consumer research to inform more potentially comprehensive changes to the EPC format in the future. We will investigate the use of behavioural change insights to nudge consumers to make energy efficiency improvements that benefit them.

C14	By end 2021	We will undertake careful consideration to the advantages and disbenefits of; reducing the validity period of EPCs from 10 years to a shorter period and how this should be targeted (for example properties where substantive works undertaken have triggered the Building Regulations).
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A data infrastructure fit for the future of EPCs

This section relates to questions of access to data, as set out in the Call for Evidence.

Delivering the information that building owners and occupiers and policy makers need

As part of meeting the challenge of achieving the UK's ambitious target for net-zero greenhouse gas emissions by 2050, EPCs have a role to play in providing consumers, building owners and occupiers and third parties with information on the performance of the building stock, and supporting effective decisions on improving the energy efficiency of buildings. It is therefore important that it is easy to access EPC information and link it to other relevant sources of data.

3.1. Homeowners, landlords, and operators of commercial buildings need to easily access EPC data, including the data underpinning the EPC rating

Property owners need to be able to easily understand how to comply with energy efficiency regulations and access data that motivates them to improve the energy performance of their buildings. Decision makers need to be empowered by high quality, timely data and analysis to inform policy choices. 80% of respondents thought that access by property owners to data underpinning their EPC rating would be at least somewhat effective in improving the ability of consumers to make use of EPC information. The Committee on Climate Change recommended improving access to data underpinning EPCs and the Standard Assessment Procedure (SAP).

3.2. Consumers and third parties will increasingly want to link EPC information to other building information online

Consumers may find EPC data useful to enhance building logbooks, for example, by linking to databases such as the TrustMark Property Hub which already creates building 'logbooks'. 76% of respondents thought that a building logbook would be at least somewhat effective in making good use of EPC information. Researchers, EPC enforcement bodies and developers of innovative energy efficiency solutions will want to access bulk datasets of EPC data to compare it to other datasets. 70% of respondents who were users of the existing Open Data website¹¹ said this was useful or very useful.

We will be mindful of data protection requirements when considering our approach to joining-up data along with technology and cost barriers that may need to be overcome. We will consider how data protection requirements, including the General Data Protection Regulation (GDPR), will affect elements of bulk data sharing, or the transfer of data to other websites.

¹¹ <https://epc.opendatacommunities.org/>

3.3. Consumers will want to be able to update an EPC with new information so it remains up to date

In future consumers will be more likely to want an updated EPC when improvements to building energy performance are made. 34 respondents to the Call for Evidence (31%) suggested that it should be possible to update the existing EPC with new information. This could work in tandem with the new trigger points proposed earlier in the Action Plan, allowing for an updated EPC at trigger points instead of requiring a new EPC.

Preparing for changes in the longer term

The data infrastructure for EPCs also needs to continue to evolve to meet future needs.

3.4. The use of smart meter and other datasets for modelling real-world performance may require changes to the data architecture

Measuring the ‘in use’ energy performance of buildings will require additional inputs such as smart meter data. Consideration will therefore need to be given to how this data can be used in accordance with data protection requirements and how the transition to a new system can be made without causing significant disruption.

A data infrastructure fit for the future EPC		
	Target for commencement	Action
D1	Ongoing	We will publish an extended Open Data dataset which will include additional data fields permitted in the regulations; and we will be building on this to provide improved access to data through the development of The Register.
D2	By the end of 2020	We will update the Simple Energy Advice website to link to the TrustMark website for finding accredited installers and improve the ability to link to financial assistance provided by Local Authorities and energy suppliers under ECO.
D3	Ongoing	We will consider how to provide additional information to help consumers inform decisions on improving their property by: <ul style="list-style-type: none"> - improving the signposting from The Register to other relevant information to consumers, such as the Simple Energy Advice website for further advice, the TrustMark portal for information on trusted tradespeople and the PRS exemptions register for checking legal compliance. - considering additional information that consumers may want to access to inform decisions around improving their property and how this can be linked to The Register and the Simple Energy Advice service to form a coherent data infrastructure.
D4	By the end of 2020	TrustMark will launch the new consumer-facing Property Hub for the Data Warehouse , which will allow property owners to access a ‘logbook’ for their property showing works which have been carried out through the government-endorsed TrustMark scheme. We will investigate the potential to link this new database to The Register
D5	By the end of 2020	We will have transitioned to the new Register . As part of this transition we will make the following improvements <ul style="list-style-type: none"> - Improving addresses on EPCs to include, where possible, OS UPRN numbers to allow The Register data to be compared easily with other government owned datasets

		<ul style="list-style-type: none"> - Providing a service similar to the current Open Data access to large EPC datasets, but allowing real-time data to be accessed rather than data being updated retrospectively as is currently the case with Open Data (subject to data protection considerations) - Being more responsive to data requirements. As the keepers of this data resource, we will be able to react quickly to changing requirements for data us within the bounds of data protection requirements.
D6	By the end of 2021	We will consider how to resolve the status quo where an individual has opted out of having their EPC data shown on the public register as this is displayed as no EPC existing , rather than showing that an EPC exists but is not displayed, which could be misleading when properties change hands. This will require consideration of data protection requirements.
D7	By the end of 2021	We will review the necessary changes to The Register required to allow EPCs to be updated following changes to the property . In particular, we will investigate storing on The register SAP input data gathered during EPC surveys, including necessary data protection policies. This is a necessary first step for creating a more flexible EPC system and allow EPCs to be updated in response to changes in a building.
D8	Ongoing	As part of The Register development, we will consider potential pathways for including SMETERs in RdSAP (looking ahead to the conclusion of the SMETERs innovation competition in March 2021) and the legal, data access and quality assurance processes which may be necessary. We will consider how the transition to such an approach might be managed and what the impacts would be on other aspects of the EPC system.